

1 Jack P. Burden, Esq.
 2 Nevada State Bar No. 6918
 3 Jacquelyn Franco, Esq.
 4 Nevada State Bar No. 13484
5 BACKUS | BURDEN
 6 3050 South Durango Drive
 7 Las Vegas, NV 89117
 8 (702) 872-5555
 9 (702) 872-5545
 10 jburden@backuslaw.com
 11 jacquelynfranco@backuslaw.com
 12 Attorneys for Defendants
 13 *The Vons Companies, Inc*
 14 and *Safeway, Inc.*

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 MARIA SHAW,) Case No. 2:24-cv-00132-RFB-DJA
 18 vs.)
 19 Plaintiff,)
 20 THE VONS COMPANIES, INC., a foreign)
 21 corporation, dba VONS, SAFEWAY, INC., a)
 22 Foreign Corporation; DOES I through X; and)
 23 ROE CORPORATIONS I through X, inclusive,)
 24 Defendants.)
 25
 26

**MOTION TO REMOVE
 DALLIN KNECHT, ESQ.
 AS COUNSEL OF RECORD
 FOR DEFENDANTS
 THE VONS COMPANIES, INC. and
 SAFEWAY, INC**

27 **TO: ALL PARTIES AND THEIR COUNSEL OF RECORD**

28 **PLEASE TAKE NOTICE** that Defendants, THE VONS COMPANIES, INC. and
 1 SAFEWAY, INC., by and through their counsel of record, JACK P. BURDEN, ESQ. and
 2 JACQUELYN FRANCO, ESQ. of BACKUS | BURDEN hereby provide notice that DALLIN
 3 KNECHT, ESQ. is no longer affiliated with the law firm of BACKUS | BURDEN and thus will no
 4 longer be associated as counsel of record for that Defendants THE VONS COMPANIES, INC.
 5 and SAFEWAY, INC in this matter.

6 As such, Defendants THE VONS COMPANIES, INC. and SAFEWAY, INC respectfully
 7 move this Honorable Court for an Order removing DALLIN KNECHT, ESQ. as counsel of record

BACKUS | BURDEN
 3050 SOUTH DURANGO
 LAS VEGAS, NEVADA 89117
 TELE: (702) 872-5555 FAX: (702) 872-5545

1 in this matter with all parties to update their respective service lists, accordingly.

2 JACK P. BURDEN, ESQ. and JACQUELYN FRANCO, ESQ. of BACKUS | BURDEN
3 will continue to serve as counsel of record for Defendants. THE VONS COMPANIES, INC. and
4 SAFEWAY, INC in this action.

5 All items including, but not limited to, pleadings, papers, correspondence, documents, and
6 future notices in this action shall continue to be directed to, and served on JACK P. BURDEN,
7 ESQ. and JACQUELYN FRANCO, ESQ. of BACKUS | BURDEN as counsel of record for the
8 Defendants, THE VONS COMPANIES, INC. and SAFEWAY, INC.

9
10 DATED this 29th day of May, 2024.

11 Respectfully Submitted,
12 **BACKUS | BURDEN**

13 By: /s/ Jack P. Burden
14 Jack P. Burden, Esq.
15 Jacquelyn Franco, Esq.
16 3050 South Durango Drive
17 Las Vegas, NV 89117
18 *Attorneys for Defendant*
19 *The Vons Companies, Inc.*
20 *and Safeway, Inc*

21
22
23
24
25
26
27
28
IT IS SO ORDERED.

DATED: 5/30/2024


21
22
23
24
25
26
27
28
DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

BACKUS | BURDEN
 3050 SOUTH DURANGO
 LAS VEGAS, NEVADA 89117
 TELE: (702) 872-5555 FAX: (702) 872-5545

1

CERTIFICATE OF SERVICE

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

I am a resident of and employed in Clark County, Nevada. I am over the age of 18 years and not a party to the within action. My business address is: 3050 South Durango Drive, Las Vegas, Nevada, 89117.

On May 29, 2024, I served this document on the parties listed on the attached service list via one or more of the methods of service described below as indicated next to the name of the served individual or entity by a checked box:

VIA U.S. MAIL: by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada. I am “readily familiar” with the firm’s practice of collection and processing correspondence by mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage fully prepaid at Las Vegas, Nevada in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

VIA FACSIMILE: by transmitting to a facsimile machine maintained by the attorney or the party who has filed a written consent for such manner of service.

BY PERSONAL SERVICE: by personally hand-delivering or causing to be hand delivered by such designated individual whose particular duties include delivery of such on behalf of the firm, addressed to the individual(s) listed, signed by such individual or his/her representative accepting on his/her behalf. A receipt of copy signed and dated by such an individual confirming delivery of the document will be maintained with the document and is attached.

BY E-MAIL: by transmitting a copy of the document in the format to be used for attachments to the electronic-mail address designated by the attorney or the party who has filed a written consent for such manner of service.

BY ELECTRONIC MEANS: by electronically filing and serving with the court’s vendor.

I declare that under penalty of perjury under the laws of the State of Nevada that the above is true and correct. I further declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

/s/ Anne Raymundo

An employee of **BACKUS | BURDEN**

1

2 **SERVICE LIST**

3

4 ATTORNEYS 5 OF RECORD	6 PARTIES 7 REPRESENTED	8 METHOD OF SERVICE
9 10 Marjorie L. Hauf, Esq. 11 Nevada Bar No.: 8111 12 Matthew G. Pfau, Esq. 13 Nevada Bar No.: 11439 14 Bre'Ahn Brooks, Esq. 15 Nevada Bar No.: 15672 16 H&P LAW 17 710 S 9th Street; Las Vegas, NV 89101 18 T: 702 598 4529 F: 702 598 3626 19 mhauf@courtroomproven.com 20 mpfau@courtroomproven.com 21 bbrooks@courtroomproven.com	22 Attorneys for 23 Plaintiff, 24 <i>Maria Shaw</i>	25 <input type="checkbox"/> Personal service 26 <input type="checkbox"/> Email service 27 <input type="checkbox"/> Fax service 28 <input type="checkbox"/> Mail service <input checked="" type="checkbox"/> Electronic Means
29	30	31

BACKUS | BURDEN
3050 SOUTH DURANGO
LAS VEGAS, NEVADA 89117
TELE: (702) 872-5555 FAX: (702) 872-5545